

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 06-_____
v.	:	DATE FILED: March ___, 2006
RAYMOND MAINOR	:	VIOLATIONS:
MARK WALKER,	:	
a/k/a "Sean Preston"	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute 5 kilograms or more of
	:	cocaine - 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute 500 grams or more of
	:	cocaine - 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute 50 grams of
	:	cocaine base ("crack") - 1 count)
	:	21 U.S.C. § 860(a) (possession with intent
	:	to distribute 500 grams or more of
	:	cocaine within 1000 feet of a school -
	:	2 counts)
	:	18 U.S.C. § 924(c) (possession of a firearm
	:	in furtherance of a drug trafficking
	:	crime - 1 count)
	:	18 U.S.C. § 922(g)(1) (possession of a
	:	firearm by a convicted felon - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 8, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

RAYMOND MAINOR and
MARK WALKER,
a/k/a "Sean Preston"

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, more than 5 kilograms, that is, approximately 15 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAYMOND MAINOR and
MARK WALKER,
a/k/a "Sean Preston"**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 5 kilograms or more, that is, approximately 15 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising the Anna L. Lingelbach School, a public elementary school, located at Wayne Avenue and Johnson Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

_____ In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

RAYMOND MAINOR

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute of, 500 grams or more, that is, approximately three kilograms,
of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

RAYMOND MAINOR

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute of, 500 grams or more, that is, approximately 3 kilograms, of
a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled
substance, within 1000 feet of the real property comprising the Grover Cleveland School, a
public elementary school, located at 3701 N. 19th Street, Philadelphia, Pennsylvania, in violation
of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

_____ In violation of Title 21, United States Code, Section 860(a), and Title 18, United
States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

RAYMOND MAINOR

knowingly and intentionally possessed with intent to distribute 50 grams or more, that is,
approximately 119 grams, of a mixture and substance containing a detectable amount of cocaine
base "crack," a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

RAYMOND MAINOR

knowingly possessed a firearm, that is, a loaded Bryco Arms 9mm semi-automatic firearm, serial no. 1330801, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine, in violation of Title 21, United States Code, Section 841(a)(1), and possession with intent to distribute cocaine within 1000 feet of an elementary school, in violation of Title 21 United States Code, Section 860(a).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

RAYMOND MAINOR,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce, a firearm, that is, a loaded Bryco Arms 9mm semi-automatic firearm, serial no. 1330801.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

1. As a result of the violation of Title 21, United States Code, Section 841(a)(1), set forth in this Indictment, defendants

**RAYMOND MAINOR and
MARK WALKER,
a/k/a "Sean Preston"**

shall forfeit to the United States of America

- (a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, including but not limited to the property of 3810 N. 18th Street, Philadelphia, Pennsylvania, the silver 2002 Ford Explorer bearing Pennsylvania license plate EPG-1632, the loaded Bryco Arms 9mm semi-automatic firearm, serial no. 1330801, \$25,000 United States currency seized from 3810 N. 18th Street, \$6,000 United States currency seized from WALKER's person, \$350,000 United States currency seized from the 2002 Ford Explorer; and \$40,000 seized from WALKER's residence; and
- (b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;

- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty.

it is the intent of the United States, to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853, Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)._____

_____ **A TRUE BILL:**

FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY_____